

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
GAINESVILLE DIVISION**

HAYES LEMMERZ )  
INTERNATIONAL-GEORGIA, INC., )  
                        )  
Plaintiff,              ) CIVIL ACTION  
                        ) NO. 2:09-CV-00021-RWS  
v.                        )  
                        )  
PUNCH PROPERTY        )  
INTERNATIONAL NV,     )  
                        )  
Defendant.             )

**PLAINTIFF'S NOTICE OF REQUEST TO DEFENDANT TO FILE  
CERTAIN DEPOSITION TRANSCRIPTS**

Pursuant to L.R. 5.4B(1), Plaintiff hereby requests that Defendant file the transcript of the following depositions in their entirety:

1. Deposition of Steve Esau (30(b)(6)) taken on July 27, 2011;
2. Deposition of Steve Esau (30(b)(6)) taken on August 19, 2011;

Plaintiff further requests that Defendant file the transcripts of the following depositions under seal in accordance with the Stipulated Confidentiality and Protective Order entered in this case [Dkt. 65 as So Ordered by Dkt. 101]:

3. Confidential Deposition of Marc Hendrickx taken on July 28, 2011;
4. Confidential Deposition of Giorgio Mariani taken on July 20, 2011;

5. Confidential Deposition of Giorgio Mariani taken on September 14, 2011;
6. Confidential Deposition of John Salvette taken on December 9, 2011;
7. Confidential Deposition of Freddy Bentley, Jr. taken on August 17, 2011; and
8. Confidential Deposition of Pieter Klinkers taken on July 19, 2011.

In accordance with Fed. R. Civ. P. 30(f)(1), Defendant, as the party who arranged for the transcript and deposition of the below listed witnesses, must store the original transcript and protect it “against loss, destruction, tampering, or deterioration.” Fed. R. Civ. P. 30(f)(1). As Defendant is the custodian of the original transcripts, Plaintiff hereby requests that the custodian, Defendant, file the discovery materials listed above and in accordance with the Stipulated Confidentiality and Protective Order as So Ordered by the Court.

Respectfully submitted this 23<sup>rd</sup> day of May, 2012.

/s/ David P. Thatcher  
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                      )  
Defendant.          )

**CERTIFICATE OF SERVICE**

I certify that on May 23, 2012, I electronically filed a copy of PLAINTIFF'S NOTICE OF REQUEST TO DEFENDANT TO FILE CERTAIN DEPOSITION TRANSCRIPTS with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to the following:

George Koenig  
Koenig Law Group, P.C.  
Peachtree 25th, Suite 599  
1718 Peachtree Street, N.W.  
Atlanta, Georgia 30309

By:/s/David P. Thatcher

David P. Thatcher  
Georgia Bar No. 703299